

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION
d/b/a/ SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, JOHN DOES 1 THROUGH
5, and JANE DOES 1 THROUGH 5,

Defendants.

Civil Action No. 04-10535-PBS

**DEFENDANTS CCBN.COM AND THE THOMSON CORPORATION'S MOTION FOR
LEAVE TO FILE RESPONSE TO WITNESS ROBERT ADLER'S MOTION FOR
PROTECTIVE ORDER**

Defendants CCBN.com, Inc. ("CCBN") and The Thomson Corporation ("Thomson") submit this Motion for Leave to File Response to Witness Robert Adler's Motion for Protective Order. In support of the motion, defendants state as follows:

1. The Motion for Protective Order involves issues that may significantly impact defendants' rights.
2. Although plaintiff's motion to compel Robert Adler's deposition was filed as an emergency motion, there is no such emergency, especially given the Court's recent order granting the parties' joint motion to extend the discovery deadline from February 1, 2005 to April 1, 2005.
3. Defendants request leave to file a response to the Motion for Protective Order no later than January 25, 2005.

4. Counsel for plaintiff assents to the relief requested in this motion. Counsel for Mr. Adler has stated that he would assent to the motion, so long as the Motion for Protective Order is decided prior to the taking of Mr. Adler's deposition.

Accordingly, Defendants respectfully request that this Court grant their Assented-To Motion for Leave to File Response to Witness Robert Adler's Motion for Protective Order.

Respectfully submitted,

CCBN.COM, INC. and THE THOMSON
CORPORATION,

By their attorneys,

/s/ David M. Moss
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DATED: January 13, 2005

LOCAL RULE 7.1A(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), counsel for defendants confer on January 13, 2005 with counsel for plaintiff and for Mr. Adler in a good faith effort, and plaintiff assents to defendant's Motion for Leave to File Response to Witness Robert Adler's Motion for Protective Order. Adler would assent to the motion, so long as the Motion for Protective Order is decided prior to the taking of Mr. Adler's deposition.

Dated: January 13, 2005

/s/ David M. Moss

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[PROPOSED] ORDER

Having considered Defendants' Motion for Leave to File Response to Witness Robert Adler's Motion for Protective Order, the Court finds the motion well-taken and it is hereby GRANTED. Defendants shall file their response to the Motion for Protective Order no later than January 25, 2005.

United States District Judge

Dated: _____, 2005